

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

BASHIR YASIN MOHAMUD (19)

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No. 3:10-00260-19
JUDGE HAYNES

Supra
Remanded
to GRANTED
Will go
12/20
95-49

MOTION TO EXCUSE BASHIR YASIN MOHAMUD'S (19) PRESENCE AT
THE DEPOSITION OF ABDULLAH FARAH a/k/a GRAY GOOSE

Comes now the Defendant, Bashir Yasin Mohamud, by and through his undersigned counsel, Bob Lynch, Jr., and hereby moves this Honorable Court to excuse Defendant Bashir Mohamud's presence at the deposition of Abdullah Farah a/k/a Gray Goose, scheduled for Wednesday, September 12, 2012, beginning at 1:00 p.m. (See D.E. 2723.)

As grounds for this motion, counsel would show that he will be present at the deposition and will protect the rights of Defendant Bashir Mohamud. Bashir Yasin Mohamud is on pre-trial release and resides in Burnsville, Minnesota. It is anticipated the deponent, Abdullahi Farah, will refuse to testify. Requiring Defendant Bashir Mohamud to be present will create an undue hardship and create unnecessary expenses under these circumstances.

For the foregoing reasons, it is respectfully requested that the presence of Defendant Bashir Yasin Mohamud be excused. Undersigned counsel will be present and represent the Defendant at the deposition.